



**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

v.

DANIEL JOSEPH ADKINS,

Defendant.

Case: 2:24-cr-20421
Assigned To : Leitman, Matthew F.
Referral Judge: Stafford, Elizabeth A.
Assign. Date : 8/6/2024
Description: IND USA V ADKINS
(SH)

Violations:

21 U.S.C. § 841(a)(1)
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 922(g)(1)

Indictment

The Grand Jury charges that:

Count One

**Possession of Methamphetamine with Intent to Distribute
21 U.S.C. § 841(a)(1)**

On or about April 11, 2024, in the Eastern District of Michigan, the defendant, DANIEL JOSEPH ADKINS, knowingly and intentionally possessed with intent to distribute a controlled substance, that is, 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(B)(viii).

Count Two
**Possession of a Firearm in Furtherance of a Drug-Trafficking
Crime**
18 U.S.C. § 924(c)(1)(A)

On or about April 11, 2024, in the Eastern District of Michigan, the defendant, DANIEL JOSEPH ADKINS, knowingly possessed a firearm in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States, that is, possess with intent to distribute a controlled substance, as charged in Count One of this Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A).

Count Three
Possession of a Firearm by a Convicted Felon
18 U.S.C. § 922(g)(1)

On or about April 11, 2024, in the Eastern District of Michigan, the defendant, DANIEL JOSEPH ADKINS, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate and foreign commerce, a firearm, that is, a Ruger, model LCP, .380 caliber pistol, in violation of Title 18, United States Code, Section 922(g)(1).

Forfeiture Allegations

The allegations contained in Counts One, Two, and Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture under Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853.

Under Title 18, United States Code, Section 924(d)(1) together with Title 28, United States Code, Section 2461(c), upon conviction of the offenses in violation of Title 18, United States Code, Section 924(c) or 922(g) set forth in Counts Two and Three of this Indictment, the defendant, shall forfeit to the United States of America, any firearm or ammunition involved in or used in any knowing violation of the offenses, including, but not limited to:

- One Ruger, model LCP, .380 caliber pistol, S/N 37602813

Under Title 21, United States Code, Section 853, upon conviction of the offense in violation of Title 21, United States Code, Section 841, as alleged in Count One of the Indictment, the defendant, shall forfeit to the United States of America any property constituting, or derived from, any

proceeds obtained, directly or indirectly, as the result of the offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

As part of the forfeiture in this case, the United States intends to seek entry of a forfeiture money judgment.

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under Title 21, United States Code, Section 853(p), as

incorporated by Title 28, United States Code, Section 2461(c).

This is a True Bill.

s/ Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON
United States Attorney

s/ Benjamin Coats
Benjamin Coats
Chief, Drug Task Force Unit

s/ Margaret Smith
Margaret Smith
Jason D. Norwood
Assistant United States Attorneys

Dated: August 6, 2024

Criminal Case Cover

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>s/ MS</i>

Case Title: USA v. Daniel Joseph Adkins

County where offense occurred : Jackson

Check One: ☒ **Felony**

☐ **Misdemeanor**☐ Petty

Indictment/ Information — **no** prior complaint.

✓ Indictment/ Information --- based upon prior complaint [Case number: 24-mj-30181

Indictment/ Information --- based upon LCrR 57.10 (d) *[Complete Superseding section below]*.

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

August 6, 2024

Date _____

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.